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ROBERT HUNTER BIDEN

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA - WESTERN DIVISION

14 ROBERT HUNTER BIDEN, an
15 individual,

16 Plaintiff

17 ||| vs

PATRICK M. BYRNE, an individual.

Defendant.

Case No. 2:23-cv-09430-SVW-PD

Hon. Stephen V. Wilson

**DECLARATION OF RICHARD A.
HARPOOTLIAN IN SUPPORT OF
PLAINTIFF ROBERT HUNTER
BIDEN'S NOTICE OF MOTION
AND MOTION FOR FURTHER
SANCTIONS AGAINST
DEFENDANT PATRICK M. BYRNE
BASED ON THE COURT'S
AUGUST 5, 2025 ORDER
DECLINING TO GRANT DEFAULT
JUDGMENT; CONTINUING
TRIAL; AND REOPENING
LIMITED DISCOVERY FOR
PLAINTIFF**

[*Notice of Motion and Motion;
Declaration of Bryan M. Sullivan; and
[Proposed] Order filed and served
concurrently herewith*] 1

Date: September 22, 2025
Time: 1:30 p.m.
Dept.: Courtroom 10A

Complaint Filed: November 8, 2023
Trial Date: October 14, 2025

1 **DECLARATION OF RICHARD A. HARPOOTLIAN**

2 I, Richard A. Harpootlian, declare and state as follows:

3 1. I am a Partner within the law firm of Richard A. Harpootlian, PA, attorneys
4 of record for Plaintiff Robert Hunter Biden (“Plaintiff”) herein. I submit this declaration
5 in support of Plaintiff’s Motion For Further Sanctions Against Defendant Patrick M.
6 Byrne Based On The Court’s August 5, 2025 Order Declining To Grant Default
7 Judgment; Continuing Trial; And Reopening Limited Discovery For Plaintiff. If called
8 as a witness, I would and could testify to the matters contained herein.

9 2. Plaintiff and all of his legal counsel were ready, willing, and able to
10 commence trial in this matter on July 29, 2025 as scheduled by the Court on March 17,
11 2025. Indeed, all six members of Plaintiff’s defense team (four attorneys and two
12 paralegals) traveled to Los Angeles, California from the east coast, stayed in hotel
13 rooms, and paid for meals and ride shares in anticipation of the July 29, 2025 trial.
14 However, the July 29, 2025 trial was continued to October 14, 2025 for the reasons
15 stated in the Court’s August 5, 2025 Order Declining To Grant Default Judgment;
16 Continuing Trial; And Reopening Limited Discovery For Plaintiff (the “August 5
17 Order”). Plaintiff will have to incur those same travel charges for the October 14, 2025
18 trial date.

19 3. I am responsible for the billing of time and expenses on this matter for my
20 firm and I have reviewed the expenses incurred for the week of July 28, 2025 to for
21 myself and my colleagues, Phillip Barber, Esq., Ms. Holli Miller, and Ms. Emily Dale,
22 to travel from the east coast to Los Angeles, California for the July 29, 2025 trial. In
23 addition, I paid for the hotel costs for the entire trial team (including Bryan M. Sullivan,
24 Esq., and Zachary Hansen, Esq., of Early Sullivan Wright Gizer & McRae LLP) and
25 bore the costs of most of the meals for the entire trial team. Those expenses are:

- 26 a. \$6,587.75 for flights myself, Phillip Barber, Esq., Ms. Holli Miller, and
27 Ms. Emily Dale, including last minute flight changes
28 b. \$19,881 for lodging for the entire trial team

- c. \$3,349.70 in meals for the entire trial team
- d. \$745.78 in Uber rides

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 25th day of August, 2025, at Columbia, South Carolina.

/s/ Richard A. Harpootlian
Richard A. Harpootlian

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